

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

**INFORMATIVE MOTION<sup>2</sup> OF THE LAWFUL CONSTITUTIONAL DEBT  
COALITION REGARDING ITS REQUEST TO BE HEARD  
AT THE APRIL 28-29, 2021 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)<sup>3</sup> submits this informative motion in response to the Court’s *Order Regarding Procedures for April 28-29, 2021 Omnibus Hearing* (Dkt. 16475) (the “Order”), and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Corrected filing to add signature for certificate of service.

<sup>3</sup> See Eleventh Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Dkt. 16421).

1. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, will appear telephonically on behalf of the LCDC at the April 28-29, 2021 omnibus hearing via CourtSolutions on a speaking line.

2. Mr. Kirpalani intends to present argument regarding to the following Documents (as defined in the *Fourteenth Amended Notice, Case Management and Administrative Procedures*, (Dkt. 15894-1)):

- a. *Motion of the Commonwealth of Puerto Rico, By and Through the Financial Oversight and Management Board, for Stay Relief to Prosecute Further Motions for Partial Summary Judgment* (Dkt. 16326);
- b. *Limited Objection of PSA Creditors to the Motion of the Commonwealth of Puerto Rico, By and Through the Financial Oversight and Management Board, for Stay Relief to Prosecute Further Motions for Partial Summary Judgment* (Dkt. 16401).

3. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the LCDC.

[Signature page follows]

DATED: April 22, 2021

Respectfully submitted,

REICHARD & ESCALERA

By : /s/ Rafael Escalera

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*Co-Counsel for the Lawful Constitutional Debt Coalition*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ /s/ *Sylvia M. Arizmendi*  
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